

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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ELIZABETH GRADY SCHOOL OF  
ESTHETICS AND MASSAGE  
THERAPY, ELIZABETH GRADY  
FACE FIRST, INC., AND EGFF  
HOLDING CORP.

Plaintiff,

v.

DR. MIGUEL CARDONA, in his  
Official Capacity as SECRETARY of the  
UNITED STATES DEPARTMENT OF  
EDUCATION

Defendant.

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Civil Action No.: 1:23-CV-12461

FILED  
IN CLERKS OFFICE  
2024 JUL 22 PM 12:50  
U.S. DISTRICT COURT  
DISTRICT OF MASS.

**MOTION FOR EXTENSION**

Kathleen M. DeNicola an individual and Kathleen M. DeNicola acting as President for the Plaintiffs Elizabeth Grady School of Esthetics and Massage Therapy, Elizabeth Grady Face First, Inc., and EGFF Holding Corp. (collectively, the “School”) request an extension on the requested stay on the proceedings pending the school’s identification of new counsel. The reason that new council has not been retained is the funds to hire the new attorney have not been received as of this date. Based on communication it is expected that those funds should be received by early September. We understand that the requested extension is unusual but as a reminder the Department took more than 9 months to address the matter that led to this, The plaintiff adds that if the Department of Education has disbursed financial aid funds as it always had the funds would not be an issue and that the funds would be available to pay for the attorney. As a Reminder the Plaintiff and Defendant were working through issues and the Plaintiff was informed to operate through the HCM2 process where the Plaintiff could still offer Financial Aid and was required to front students aid money and to provide proof of that cleared payment to the Department of Education this put a further strain of funding.

In the Alternative the Plaintiff requests that the court dismiss the motion without prejudice.

**ELIZABETH GRADY SCHOOL OF  
ESTHETICS AND MASSAGE THERAPY,  
ELIZABETH GRADY FACE FIRST, INC., EGFF HOLDING  
CORP. AND  
KATHLEEN M. DENICOLA**  
Respectfully submitted,

By its President,



**Kathleen M. DeNicola**

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